

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

DINNTECO INTERNATIONAL, S.L., an
entity of Andorra la Vella,

Plaintiff,

v.

CAPITOL ELECTRONICS SALES, INC., an
Indiana corporation; EMP DEFENSE, LLC, a
Michigan limited liability company;
SEAHAWKE MARINE INC., a Florida
corporation; RIPPING IT OUTDOORS LLC, a
Florida limited liability company; and JAY
BHARAT KOTHARI d/b/a EMP Solutions, an
individual residing in the state of Florida,

Defendants.

Case No. 1:25-cv-22786

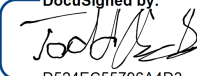
DECLARATION OF TODD OSADJAN JR.

I, Todd Osadjan Jr., under penalty of perjury, declare as follows:

1. I am the President of Seahawke Marine Inc.
2. Between 2023-2024 Seahawke Marine Inc. purchased lightning suppressors from EMP Solutions, Inc.
3. It is my understanding that Mr. Jay Kothari is the President of EMP Solutions, Inc.
4. Mr. David Rosati is not an employee of Seahawke Marine Inc. Mr. Rosati never informed me that he was given a copy of a complaint against Seahawke Marine Inc.
5. Seahawke Marine Inc. was never served with a default.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on October 29, 2025.

DocuSigned by:

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Todd Osadjan Jr.